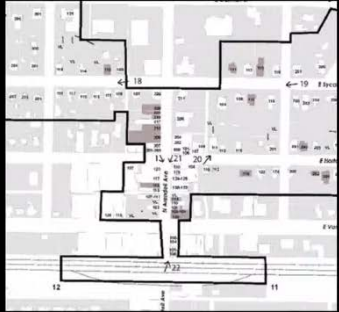
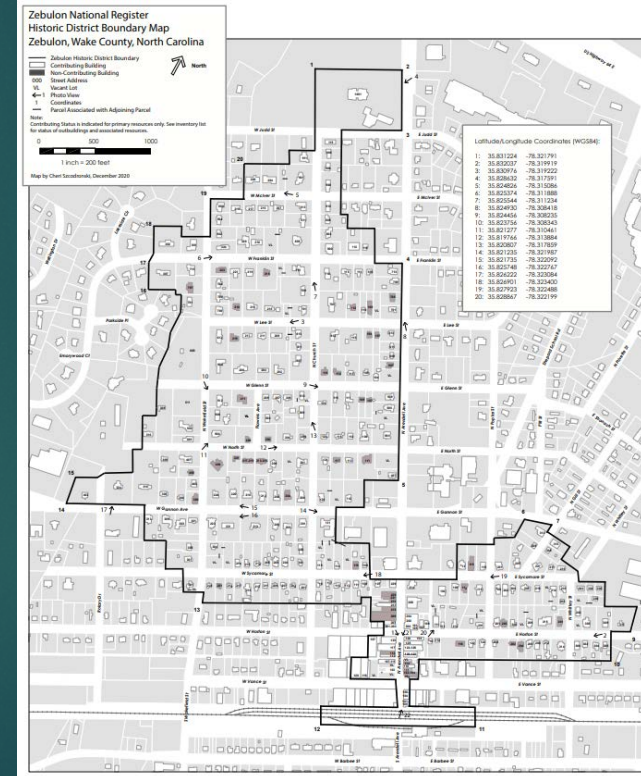


Criterion A: Commerce



Criterion C: Architecture

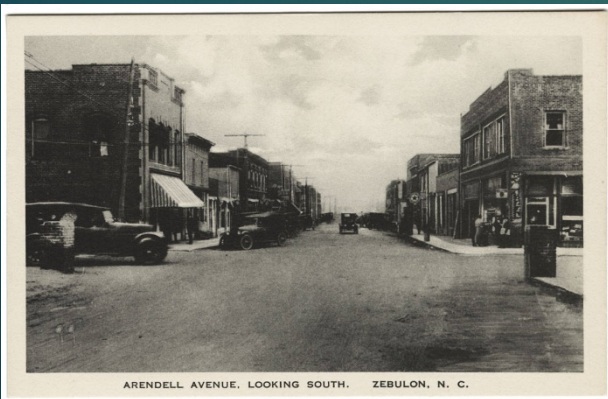


Zebulon Historic District

for Town of Zebulon Joint Public Hearing

PRESERVATION ZEBULON

10 JANUARY 2022



Agenda

"Presentation of Request"

2

- ▶ Preservation Zebulon – who we are and what we do
- ▶ Why a historic district benefits Zebulon
- ▶ The story of how the Zebulon Historic District came to be
- ▶ Next steps
- ▶ Analysis and recommendations



Preservation Zebulon

Who we are and what we do



- ▶ Founded in 2015
- ▶ Incorporated as an NC 501(c)(3) non-profit in 2016
- ▶ Events:
 - ▶ Murder Mystery fundraiser
 - ▶ Historic walking tours
 - ▶ Zebulation!
 - ▶ Preservation Merit Awards
 - ▶ Preservation Day
 - ▶ Historic Homes Tour (coming soon)



Preservation Zebulon

Who we are and what we do

4

- ▶ Zebulon Memory Project
 - ▶ Rex Tippet
 - ▶ Eva Liles
 - ▶ Rebecca Horton Hinton
 - ▶ Ruth Moss
 - ▶ (more to come...)



Why a Historic District Benefits Zebulon (1)

Ms. MaryBeth Carpenter	Preservation Zebulon, Executive Director
Ms. Season Atkinson	Commercial property owner
Ms. Allie Gecewicz	Owner, George and Neva Barbee House, individually listed on the NRHP
Mr. John Saffold	Zebulon Chamber of Commerce, Executive Director
Ms. Patricia Roberson	Residential property owner, Community Leader



Why a Historic District Benefits Zebulon (2)

** Mr. Tommy Massey	President, Friends of Wakelon Family in Zebulon area > 250 years
** Mr. Brian Bullock	Winner of Zebulon Preservation Merit Award for restoration work (Simply Blush Bridal)
** Ms. Sherry Adams	NC Main Street

“Main Street is ***ECONOMIC DEVELOPMENT WITHIN THE CONTEXT OF HISTORIC PRESERVATION.***” While not all designated Main Street communities may be eligible for a National Register District they are still held accountable to embracing best preservation practices. ***FOR THOSE WITH NHR DISTRICTS WE EXPECT THEM TO BE SUPPORTIVE OF THE BENEFITS OF HAVING A DISTRICT.***

Sherry B. Adams

Coordinator, Downtown Programming & Technical Services
NC Main Street & Rural Planning Center
Rural Economic Development Division
North Carolina Department of Commerce

** written comments to be read into the record



The Story of the Zebulon Historic District



RESIDENCE OF H. W. WHITE



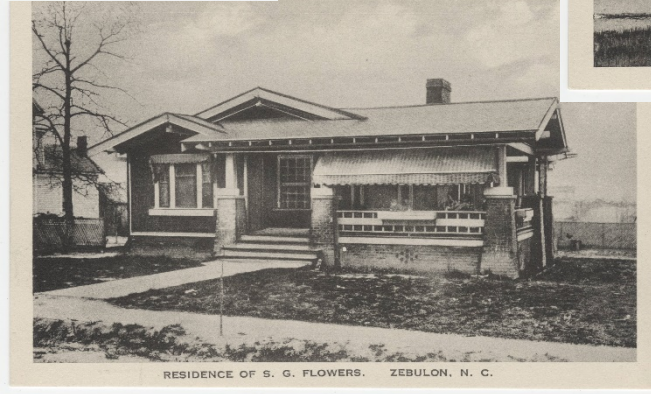
RESIDENCE OF W. C. CAMPEN. ZEBULON, N. C.



GIRLS' DORMITORY, WAKELON HIGH SCHOOL. ZEBULON, N. C.



RESIDENCE OF DR. C. E. FLOWERS. ZEBULON, N. C.



RESIDENCE OF S. G. FLOWERS. ZEBULON, N. C.



2015

- ▶ No historic district possible
 - ▶ No recent architectural survey of the Zebulon area
- ▶ **RED LIGHT**

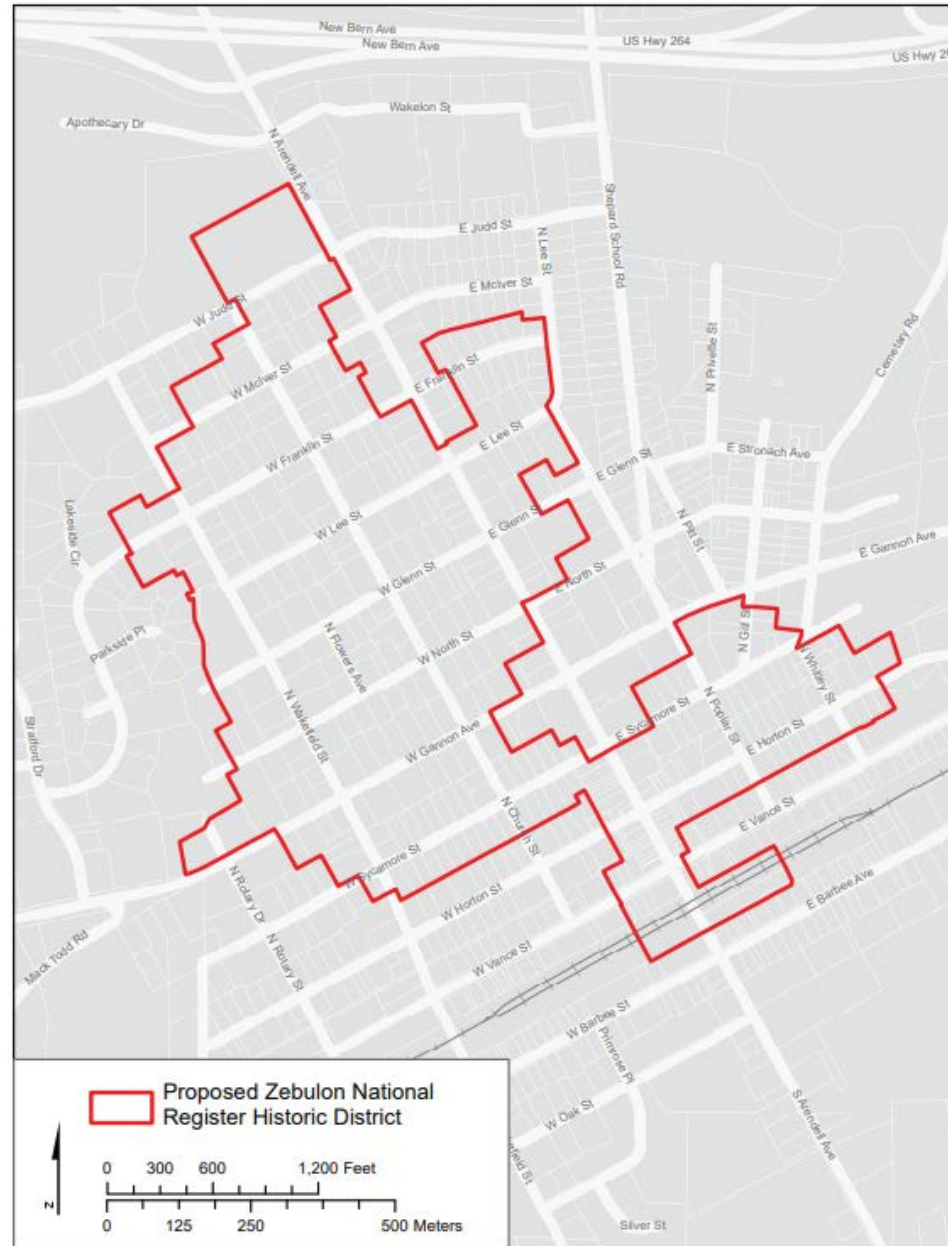
8



2018

- ▶ Wake County Architectural Survey Update, Phase IV
 - ▶ The primary goals of the project were to document resources within a proposed National Register of Historic Places (NRHP) **Study List District** in the town of Zebulon
 - ▶ Each of the surveyed properties was evaluated for its potential eligibility for listing in the NRHP
 - ▶ Cultural resources can be defined as significant if they "possess integrity of location, design, setting, materials, workmanship, feeling, and association and if they are 50 years of age or older"
- ▶ **YELLOW LIGHT**

Figure 2.
Map of Proposed Zebulon NRHP District

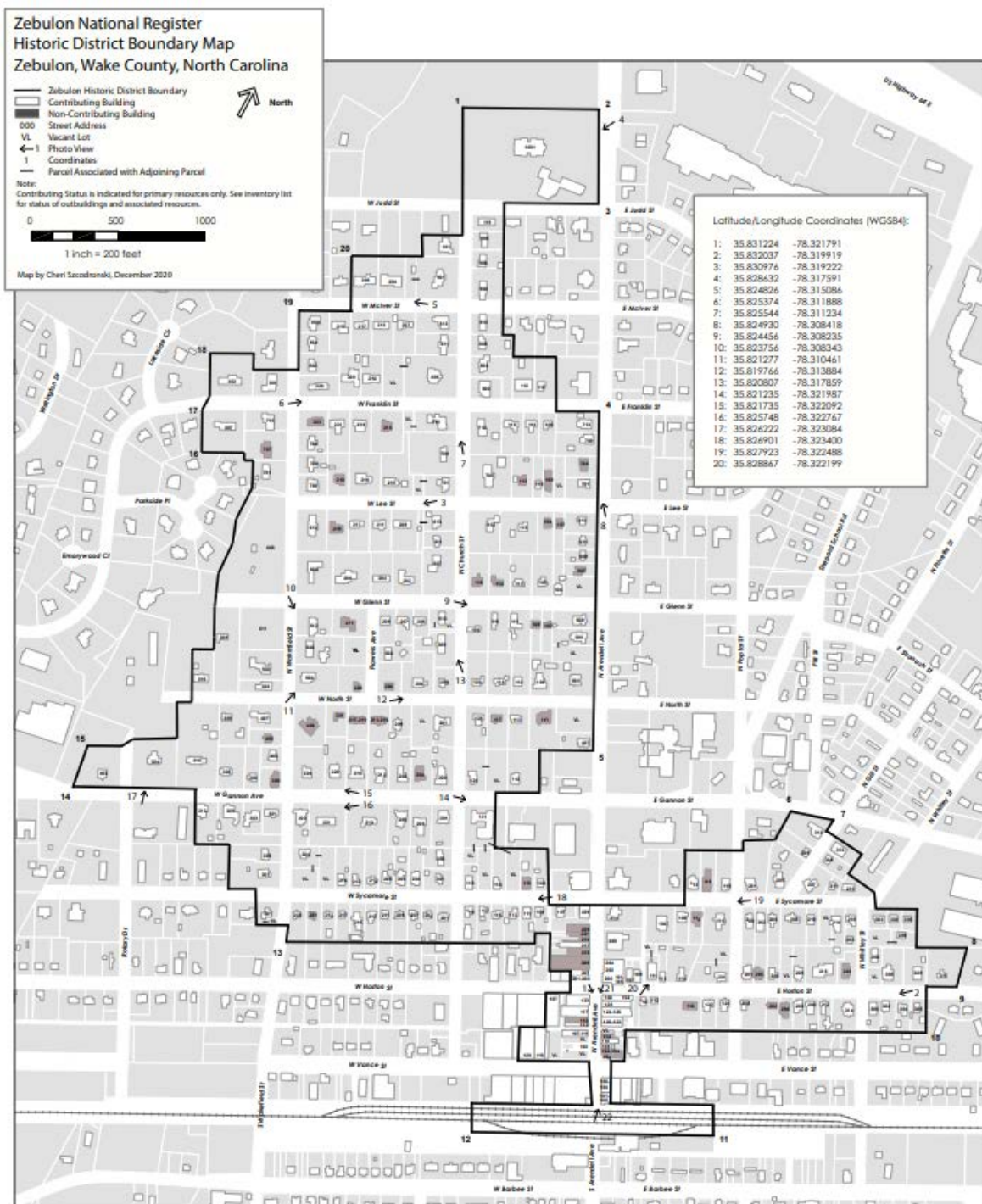


Source: NC Spatial Download (2018)



2020

- ▶ Boundary map from the Zebulon National Register Historic District Boundary Map nomination
- ▶ “All contributing resources were constructed during the period of significance, 1906 to 1971, and retain sufficient integrity of location, design, setting, materials, workmanship, feeling, and association to contribute to the historic character of the district.”
- ▶ **GREEN LIGHT**

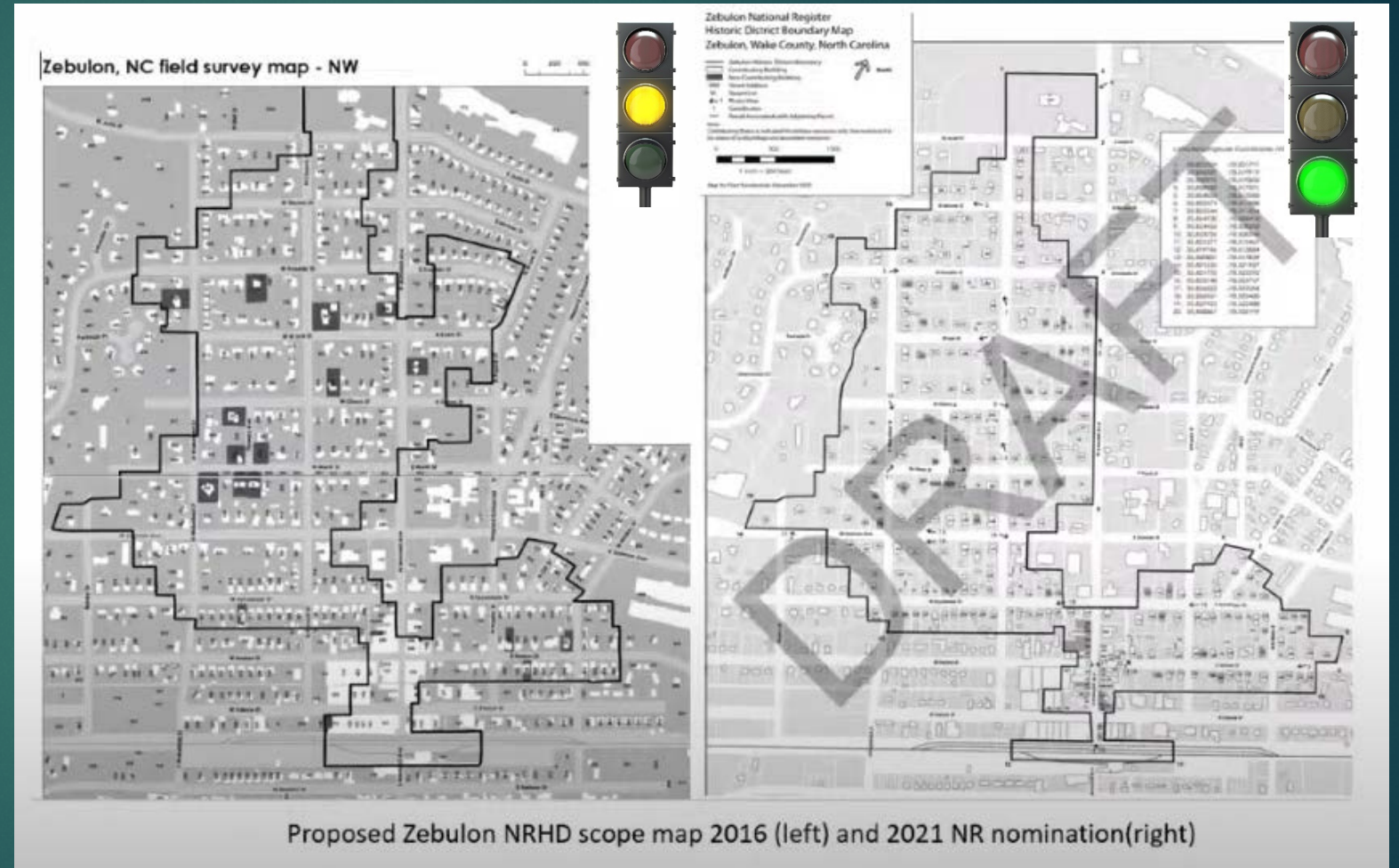


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2018 Study List vs. 2021 Nomination

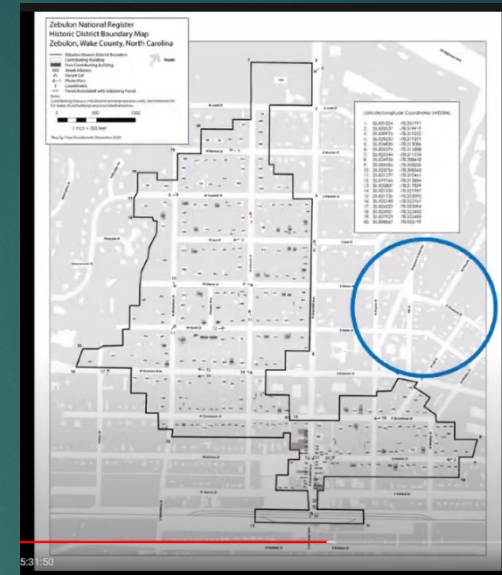
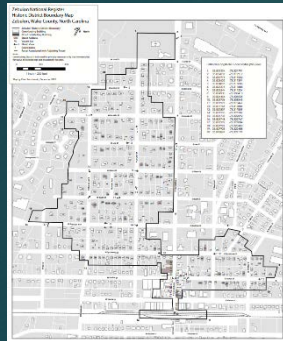
- ▶ Boundaries mostly the same
 - ▶ Most notably the area east of N. Arendell has been removed
- ▶ Nomination meets the criteria for evaluation
 - ▶ And, so, moves on "to be evaluated"



National Register Advisory Committee

June 2021

12



- ▶ YouTube “National Register Advisory Committee – June 2021”



- ▶ <https://www.youtube.com/watch?v=Lr9y6-gF1-k>
- ▶ Zebulon Historic District discussion: 02:10 – 03:13
- ▶ Timeline of the district nomination process is given
- ▶ Comments and concerns of the Town were discussed in detail
 - ▶ Including African-American neighborhoods
- ▶ Nomination unanimously approved by the NRAC



Town's Petition to the Keeper of the Register


1. The Zebulon Historic District, as proposed, does not meet the criteria for listing in the National Register.
2. Prejudicial procedural error occurred in the nomination process.
3. An error in professional judgment occurred as to whether the Zebulon Historic District meets the criteria for evaluation.
4. The Town of Zebulon and the County of Wake County North Carolina are parties to a Joint Historic Preservation Commission Agreement.



Keeper of the Register's Response After Substantive Review

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- ▶ Nomination is RETURNED due to prejudicial procedural error.
- ▶ Wake County Historic Preservation Commission serves as the CLG
- ▶ The original decision to bypass CLG review was based on advice from the NPS.
 - ▶ However, did not take into account the Wake County agreement



United States Department of the Interior
NATIONAL PARK SERVICE
1849 C Street, N. W.
Washington, DC 20240

IN REPLY REFER TO:

**The United States Department of the Interior
National Park Service**

**National Register of Historic Places
Evaluation/Return Sheet**

Property Name: Zebulon Historic District, Wake County, North Carolina
Reference Number: 100006811

Reason for Return


The nomination for the Zebulon Historic District is being returned due to prejudicial procedural error in the nomination process. This procedural error was discovered as a result of the Town of Zebulon's August 18, 2021 petition to the Keeper per 36 CFR 60.6(t). This petition pushed the final review period forward 30 days, until September 17, 2021.

The Wake County Historic Preservation Commission (WCHPC) serves as the Certified Local Government (CLG) authority within the jurisdiction of the Town of Zebulon. As such, the nomination must undergo a review by the WCHPC. Should the WCHPC recommend the nomination, it will have to go through the state review board process as well.





The original decision to bypass the CLG review was based on advice from the NPS. However, the specific circumstances of the Wake County CLG agreement were not taken into account when this advice was given. The State followed procedures based on their understanding of NPS guidance, but in doing so inadvertently created a procedural error.

We appreciate the opportunity to review this nomination and hope that you find these comments useful. Please feel free to contact me if you have any questions. I can be reached at (202) 354-2275 or email at james_gabbert@nps.gov.

Sincerely,



Town's Petition and the Keeper of the Register's Response

-  1. The Zebulon Historic District, as proposed, does not meet the criteria for listing in the National Register.
-  2. Prejudicial procedural error occurred in the nomination process.
-  3. An error in professional judgment occurred as to whether the Zebulon Historic District meets the criteria for evaluation.
-  4. The Town of Zebulon and the County of Wake County North Carolina are parties to a Joint Historic Preservation Commission Agreement.

Next Steps



Options

SHPO and NPS

- ▶ OPTION A
 - ▶ AS IS nomination (no change)
- ▶ OPTION B
 - ▶ Substantive changes
 - ▶ Process starts all over from scratch

PROPOSED ZEBULON NATIONAL REGISTER HISTORIC DISTRICT NOMINATION			
<p>OPTION A</p> <p>AS IS nomination (no changes)</p>	<ol style="list-style-type: none"> 1. State submits proposed nomination AS IS to Wake County Historic Preservation Commission (WCHPC) for review and comment pursuant to 54 USC § 302504. 2. Submit simultaneously to both chief elected officials of the Town of Zebulon AND Wake County Commission (verifying same with NPS as to both) 3. WCHPC – after reasonable opportunity for public comment – prepares report: does the property meet the criteria of the National Register or not <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> <p>IF WCHPC and elected officials agree with one another and recommend the nomination > OR</p> <p>If WCHPC and elected officials disagree with one another ></p> <ul style="list-style-type: none"> ▶ State will forward nomination directly to the Keeper </td> <td style="width: 50%; padding: 5px;"> <p>IF BOTH WCHPC and elected officials recommend DENIAL > nomination process STOPS</p> <ul style="list-style-type: none"> ▶ BUT if any person appeals to the State within 30 days of that recommendation, then nomination proceeds to next available NRAC meeting <ul style="list-style-type: none"> ○ Owner notification required ○ NRAC may recommend submitting to the Keeper or NOT ○ State Historic Preservation Officer (SHPO) may concur with NRAC recommendation ▶ If both NRAC and SHPO concur is eligible > nomination sent to Keeper ▶ If NRAC and SHPO disagree is eligible > nomination sent to Keeper ▶ If NRAC and SHPO agree is NOT eligible > process STOPS, <i>unless</i> any person elects to appeal pursuant to 36 § CFR 60.12 </td> </tr> </table>	<p>IF WCHPC and elected officials agree with one another and recommend the nomination > OR</p> <p>If WCHPC and elected officials disagree with one another ></p> <ul style="list-style-type: none"> ▶ State will forward nomination directly to the Keeper 	<p>IF BOTH WCHPC and elected officials recommend DENIAL > nomination process STOPS</p> <ul style="list-style-type: none"> ▶ BUT if any person appeals to the State within 30 days of that recommendation, then nomination proceeds to next available NRAC meeting <ul style="list-style-type: none"> ○ Owner notification required ○ NRAC may recommend submitting to the Keeper or NOT ○ State Historic Preservation Officer (SHPO) may concur with NRAC recommendation ▶ If both NRAC and SHPO concur is eligible > nomination sent to Keeper ▶ If NRAC and SHPO disagree is eligible > nomination sent to Keeper ▶ If NRAC and SHPO agree is NOT eligible > process STOPS, <i>unless</i> any person elects to appeal pursuant to 36 § CFR 60.12
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<p>OPTION B</p> <p>Substantive changes made to nomination</p>	<p>Process starts over from scratch</p> <p>(new public meetings, owner notifications, local commission review)</p>		

October 2021

North Carolina State Historic Preservation Office



Zebulon Next Steps Conversation

18

27 Oct 2021 – SHPO, PZ, Town of Zebulon staff and Mayor, WCHPC staff

- ▶ Preservation Zebulon said they would not object to the Town's wishes, if this could be achieved quickly (for the Feb, 2022 NRAC meeting).
 - ▶ What we heard was that **any changes** would result in a restart of the entire process
 - ▶ 4+ years
 - ▶ No guarantee that a revised boundary would be accepted by NPS



Dr. Darin J. Waters

North Carolina Deputy Secretary for Archives and History
State Historic Preservation Officer
NC African American Heritage Commission,
Black History Month, Honoree, 2018

Dr. Darin Waters, recommended a compromise path forward, which would be a "parallel process": proceed with the existing nomination while also pursuing an expansion survey. This would allow for the necessary survey work and a nomination to be prepared that could adjust the boundaries of the Zebulon Historic District. We refer to this option as Option "C".



Parallel Process

▶ Changes to the existing boundaries →



▶ Existing nomination →



▶ Pathway to boundary adjustments →



Correcting the Procedural Error

The commission and the chief elected official are required to submit comments to the State Historic Preservation Office relaying their findings as to the eligibility of the property under consideration for listing in the National Register. The attached forms are provided for you to facilitate your review of nominations and your submittal of comments to the State Historic Preservation Office. A copy of the criteria for listing in the National Register is also enclosed for your reference and use.

"The Form"



THE CHIEF ELECTED LOCAL OFFICIAL OR THE LOCAL GOVERNING BOARD SHOULD COMPLETE ONE OF THE FOLLOWING COMMENT PARAGRAPHS:

E. I, **Mayor Robert S. Matheny**, or We, the **Zebulon Town Council**, have reviewed the nomination for **Zebulon Historic District** and find that the property meets the criteria for listing in the National Register of Historic Places as stated in Section 8 of the report. We therefore, **recommend** that the property be submitted for listing in the Register.

Additional Comments:

Chief Local Elected Official's signature and date

F. I, **Mayor Robert S. Matheny**, or We, the **Zebulon Town Council**, have reviewed the nomination for **Zebulon Historic District** and find that the property does not meet the criteria for listing in the National Register of Historic Places as stated in Section 8 of the report. We therefore, **do not recommend** that the property be submitted for listing in the Register. The reasons for my (or our) findings concerning this nomination are stated below (use additional sheet if necessary).

Additional comments:

Chief Local Elected Official's signature and date



Analysis and recommendations

22



Zebulon Next Steps (1)

23

PZ met with WCHPC staff 09 Nov 2021

PZ met with Town of Zebulon staff and Mayor 11 Nov 2021

- ▶ Preservation Zebulon was in agreement with the Town to pursue a change in the boundaries if it could be done and done in an expeditious manner. However, our take away from the SHPO meeting was that it could not be done expeditiously and there was very much doubt presented from SHPO and other experts on the call that it could be done at all because it would simply not leave a cohesive historic district.
 - ▶ What we heard explained at the meeting was that, even with PZ being in agreement to the changes that the Town is proposing, SHPO has already considered those issues and does not believe they create a cohesive historic district.
 - ▶ Moreover, it was also explained that a fundamental change to the nomination would lead to our nomination being placed back in the queue for SHPO staff review before it can even be presented for a nomination.
 - ▶ We do not believe that SHPO would approve the nomination with the boundary changes that have been proposed by the Town.
 - ▶ SHPO felt that, if a nomination were presented that excluded Wakelon Heights that the NPS would likely return the nomination with instructions to include it.



Zebulon Next Steps (2)

24

PZ met with WCHPC staff 09 Nov 2021

PZ met with Town of Zebulon staff and Mayor 11 Nov 2021

- ▶ Under federal law, SHPO is the body that has the authority in our state to identify and nominate structures to the National Register.
- ▶ We agree that the Commissioners need a presentation from SHPO about all of these issues and the Commissioners need the opportunity to ask questions and understand the issues for themselves.
- ▶ Therefore, Preservation Zebulon, for the reasons stated above, does intend to ask SHPO to begin the process that was listed as Option A at the October 27, 2021 meeting which was for the nomination to be forwarded as-is to the Town and to the WCHPC for review and comment prior to the February, 2022 NRAC meeting.
- ▶ We hope that you understand that we are only acting in the best interests of the Town and its citizens in getting a historic district established here and the historic district previously presented is the only one that SHPO believes is a cohesive district for nomination to the National Register.

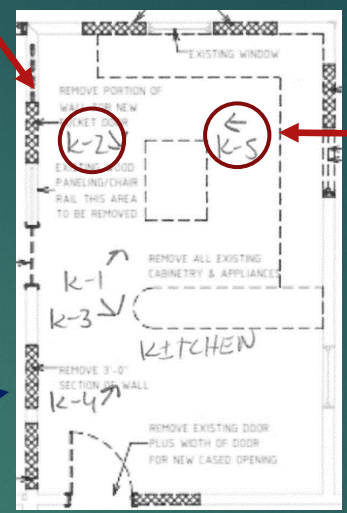
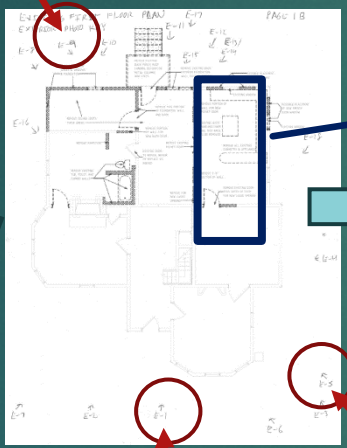


Benefits of Listing on the National Register of Historic Places

- ▶ Honorary
 - ▶ Places NO RESTRICTIONS on property owners that do not want tax credits
- ▶ Tax CREDITS (State and/or Federal) are AVAILABLE
 - ▶ Do not want Tax Credits
 - ▶ No Impact
 - ▶ Wish to claim Tax Credits
 - ▶ Process managed by SHPO
 - ▶ Application process
 - ▶ Documentation, photos
 - ▶ Need to show that workmanship completed follows Department of Interior Standards
 - ▶ “Tax Credit Workshop” is needed for Zebulon

Tax Credits

Ex: John D. Finch House



Historic Preservation Certification Application form with fields for name, address, and project details.



Policy Analysis

(Zebulon Staff)

- ▶ The claim: a smaller district would meet the Town's economic goals.
 - ▶ This claim focuses on the "downtown that 'serves as the heart of Zebulon'" and therefore would disenfranchise residential property owners.
 - ▶ This claim is not a part of the evaluation criteria for listing on the National Register.

Policy Analysis:

When initiated to address community issues, and developed through robust community engagement, listing a neighborhood as a district onto the National Register can assist communities in meeting their community and economic development policy goals. Listing the neighborhood encompassing the areas surrounding the railroad corridor to the south and North Street to the north (i.e., the Town's core and origin), would meet Zebulon's community and economic development goals as adopted in the *Town of Zebulon Vision 2030 Strategic Plan*. A historic district encompassing these tighter boundaries accomplishes policy goals in all three focus areas of the Zebulon 2030 Strategic Plan. The condensed boundary achieves **Vibrant Downtown** goals by preserving a historic downtown that "serves as the heart of Zebulon". These tighter boundaries achieve **Growing Smart** goals by concentrating incentives towards the section of Town where reinvestment of significantly older buildings is problematic. Finally, downtown is an area open to, and claimed by, all. Incentivizing the preservation of Zebulon's downtown meets the **Small-Town Life** goals by "developing more locations to gather with family and neighbors, making Zebulon a safe, connected, family friendly and walkable town".

BULON
NORTH CAROLINA

STAFF REPORT
ZEBULON NATIONAL HISTORIC DISTRICT
JANUARY 10, 2022

Unfortunately, the current application was not initiated to address a community need, nor was it developed through robust community engagement. As such, the application reflects an unusually large area that combines a mix-match of two distinctly different neighborhoods created at different times with different architectural styles while at the same time, excluding other neighborhoods and buildings centrally important to Zebulon's history and origin. The nomination also lists buildings that have undergone substantial modifications or are beyond restoration and repair, while excluding other prominent downtown buildings from the district entirely. Ultimately, designating such a large, and incongruous, area works against Zebulon's community and economic development policy goals. The large area dilutes the importance, and disorients the boundaries, of a downtown literally central to explaining the Town's origin and cultural character, and as such, undercuts achieving economic and community development goals within the Zebulon Strategic Plan focus area of Vibrant Downtown, Growing Smart, and Small Town Life.

A smaller, condensed district encompassing the areas surrounding the railroad corridor to the south and North Street to the north (i.e., the Town's core and origin), would meet Zebulon's community and economic development goals as adopted in the *Town of Zebulon Vision 2030 Strategic Plan*.

Staff Recommendation:

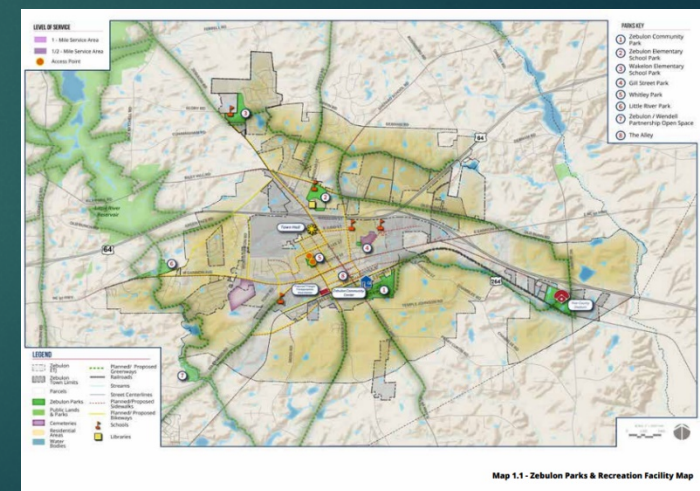
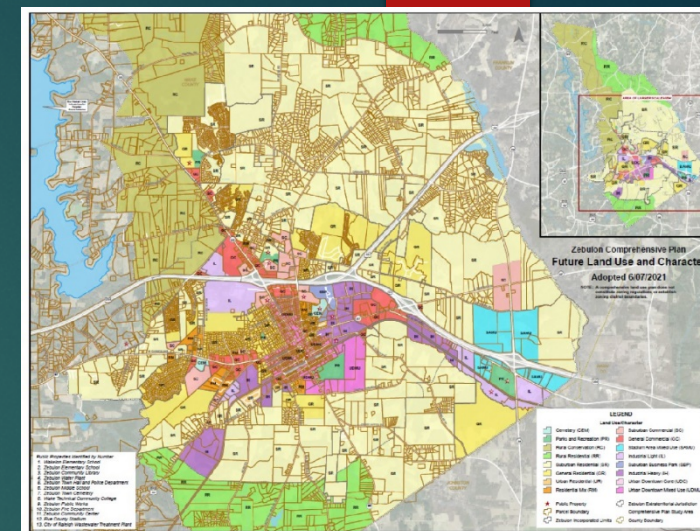
Staff recommends consideration of comments, information, and documentation at the January 10, 2022, Public Hearing.

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The Heart of Zebulon is more than just the downtown area

- ▶ Town of Zebulon has enacted numerous policies that extend beyond the “core downtown”
 - ▶ 2030 Strategic Plan celebrates “Small-Town Life”
 - ▶ “Small-Town Life” means the small-town charm that exists in Zebulon; It does not mean “small district required.”
- ▶ Unified Development Ordinance – land use and development
 - ▶ Addresses many different land uses and districts, and has a placeholder for Historic District Overlay
- ▶ Comprehensive Land Use Plan
- ▶ Parks & Recreation Master Plan



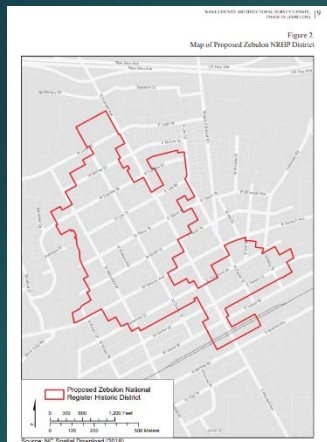
National Register criteria for evaluation

- ▶ Does the property meet the criteria for listing on the National Register?

- ▶ 36 CFR 60.4:

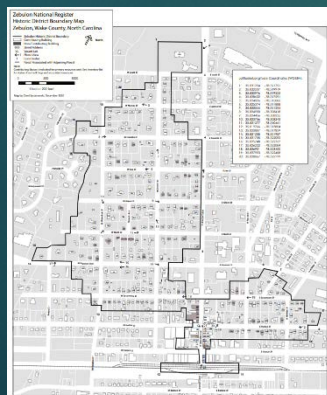
National Register criteria for evaluation. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association.

Information that the Zebulon Historic District meets the criteria for listing on the National Register



▶ 2018 Survey

- ▶ The primary goals of the project were to document resources within a proposed National Register of Historic Places (NRHP) Study List District in the town of Zebulon
- ▶ identify areas and resources potentially eligible for listing in the NRHP
- ▶ Cultural resources were evaluated based on criteria for NRHP eligibility specified in the Department of Interior Regulations 36 CFR Part 60: National Register of Historic Places. Cultural resources can be defined as significant if they “possess integrity of location, design, setting, materials, workmanship, feeling, and association and if they are 50 years of age or older”




▶ Nomination prepared by trained preservation consultant

- ▶ All contributing resources were constructed during the period of significance, 1906 to 1971, and retain sufficient integrity of location, design, setting, materials, workmanship, feeling, and association to contribute to the historic character of the district.

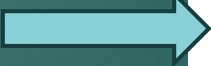


Information that the Zebulon Historic District meets the criteria for listing on the National Register



- ▶ Significant review by the NC National Register Advisory Committee, June 2021
 - ▶ Reviewed issues and concerns raised by the Town of Zebulon
 - ▶ Spent over an hour discussing the nomination in detail, including addressing the concerns about the exclusion of the African-American neighborhoods
 - ▶ Available for your review: [YouTube "National Register Advisory Committee – June 2021"](#) 
 - ▶ Unanimously approved the nomination (as it exists in its current form)



- ▶ Further approved by the State Historic Preservation Officer 
- ▶ The Keeper of the Register conducted a substantive review of the nomination and did not substantiate any of the Town's claims about why the district did not meet the criteria
 - ▶ No technical edits required



(o) The [State Historic Preservation Officer](#) signs block 12 of the nomination form if in his or her opinion the property meets the National Register criteria for evaluation. The [State Historic Preservation Officer's](#) signature in block 12 certifies that:


- (1) All procedural requirements have been met;
- (2) The nomination form is adequately documented;
- (3) The nomination form is technically and professionally correct and sufficient;
- (4) In the opinion of the [State Historic Preservation Officer](#), the property meets the National Register criteria for evaluation.

36 CFR Part 60.6 (o)



Recommendations

32

- ▶ Watch the NRAC discussion of the Zebulon Historic District
 - ▶ YouTube “National Register Advisory Committee – June 2021”
 - ▶ <https://www.youtube.com/watch?v=Lr9y6-gF1-k> 
 - ▶ Zebulon Historic District discussion: 02:10 – 03:23
- ▶ Consideration of comments, information, and documentation
 - ▶ And ASK QUESTIONS
- ▶ Find that the property meets the criteria for listing on the National Register of Historic Places
- ▶ Support bringing a “tax credits” workshop to Zebulon
- ▶ Work together on next steps to further study Zebulon’s historic resources

Thank you

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- ▶ To contact Preservation Zebulon:
 - ▶ Web: <https://preservationzebulon.org>
 - ▶ Email: info@preservationzebulon.org
 - ▶ Facebook: @PreservationZebulon
 - ▶ Phone/Text: 919-413-5083

- ▶ To find this presentation, go to: <https://preservationzebulon.org/zebulon-national-register-historic-district/>

